

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF OKLAHOMA**

**IN RE:****CASE NO. 24-80617****CHAPTER 11**

**C M HEAVY MACHINERY, LLC,  
Debtor.**

**SUPPLEMENTAL EXHIBIT LIST**

☒ **MOVANT** Great Plains National Bank (“GPNB”)<sup>1</sup>☐ **RESPONDENT**

DATE OF HEARING: April 9, 2025		OPERATOR		PAGE NO.
EXHIBIT NO.	DESCRIPTION (Brief description and intended purpose)	I D	ADMITTED	REJECT/WD
1.	Description: Voluntary Petition for Non-Individuals Filing for Bankruptcy, Schedules, and Statement of Financial Affairs [Doc. No. 1]  Intended Purpose: To demonstrate the assets and liabilities listed by the Debtor on the Petition Date.			
2.	Description: Initial Report and Attachments [Doc. No. 29]  Intended Purpose: To evaluate the assets and liabilities of the Debtor, the Debtor’s operations, and the status of the Debtor’s financial records as of the filing of the Initial Report.			
3.	Description: August 2024 Monthly Operating Report [Doc. No. 46]  Intended Purpose: To evaluate the assets and liabilities of the Debtor, the Debtor’s operations, and the status of the Debtor’s financial records.			
4.	Description: September 2024 Monthly Operating Report [Doc. No. 49]  Intended Purpose: To evaluate the assets and liabilities of the Debtor, the Debtor’s operations, and the status of the Debtor’s financial records.			

<sup>1</sup> GPNB is the Supplemental Exhibit List for Case No. 24-80617, filed 04/02/25, entered 04/02/25 15:05:34, Debtor’s Meeting dated May 14, 2025. See Doc. No. 133.

5.	<p>Description: October 2024 Monthly Operating Report [Doc. No. 52]</p> <p>Intended Purpose: To evaluate the assets and liabilities of the Debtor, the Debtor's operations, and the status of the Debtor's financial records.</p>			
6.	<p>Description: October 2024 Bank Records [Doc. No. 61]</p> <p>Intended Purpose: To evaluate the assets and liabilities of the Debtor, the Debtor's operations, and the status of the Debtor's financial records.</p>			
7.	<p>Description: November 2024 Monthly Operating Report [Doc. No. 63]</p> <p>Intended Purpose: To evaluate the assets and liabilities of the Debtor, the Debtor's operations, and the status of the Debtor's financial records.</p>			
8.	<p>Description: December 2024 Monthly Operating Report [Doc. No. 77]</p> <p>Intended Purpose: To evaluate the assets and liabilities of the Debtor, the Debtor's operations, and the status of the Debtor's financial records.</p>			
9.	<p>Description: January 2025 Monthly Operating Report [Doc. No. 114]</p> <p>Intended Purpose: To evaluate the assets and liabilities of the Debtor, the Debtor's operations, and the status of the Debtor's financial records.</p>			
10.	<p>Description: First Amended Chapter 11 Plan of Reorganization [Doc. No. 119]</p> <p>Intended Purpose: To evaluate the Debtor's Plan of Reorganization.</p>			
11.	<p>Description: Disclosure Statement for Chapter 11 Plan of Reorganization [Doc. No. 56]</p> <p>Intended Purpose: To evaluate the Debtor's Plan of Reorganization.</p>			
12.	<p>Description: Supplement to Disclosure Statement for Chapter 11 Plan of Reorganization [Doc. No. 120]</p>			

	Intended Purpose: To evaluate the Debtor's Plan of Reorganization.			
13.	Description: Petition, Oklahoma County Case No. CJ-2025-1270  Intended Purpose: To evaluate the Debtor's insurance claim and C. Meadors' fiduciary duties thereto.			
14.	Claim No. 13, Great Plains National Bank  Intended Purpose: To establish GPNB's claim against the Debtor.			
15.	Claim No. 1, Internal Revenue Service  Intended Purpose: To evaluate the Debtor's liability to the IRS.			
16.	GPNB's Transaction History Statement  Intended Purpose: To evaluate GPNB's claim against the Debtor and the Debtor's prepetition conduct.			
17.	GPNB – GPS Tracking Data  Intended Purpose: To evaluate the Debtor's assets and business operations.			
18.	Description: Deposition Testimony of C. Meadors  Intended Purpose: To impeach C. Meadors by prior inconsistent statements or to introduce as an opposing party's statement.			
19.	Description: Deposition Testimony of H. Goodson  Intended Purpose: To impeach H. Goodson by prior inconsistent statements or to introduce as an opposing party's statement.			
20.	Description: Defendant's Motion to Vacate Journal Entry of Judgment and to Set Cause for Hearing to Settle Journal Entry, Okfuskee County Case No. CJ-24-34  Intended Purpose: To impeach C. Meadors and to evaluate the Debtor's conduct with the insurance claim.			
21.	Description: February 2025 Monthly Operating Report [Doc. No. 146]  Intended Purpose: To evaluate the assets and liabilities of the Debtor, the Debtor's operations, and the status of the Debtor's			

	financial records.			
22.	<p>Description: List of Equipment located on the Debtor's property not listed on the Debtor's bankruptcy schedules.</p> <p>Intended Purpose: To evaluate the assets and liabilities of the Debtor, the Debtor's operations, and the status of the Debtor's financial records.</p>			
23.	<p>Description: Notes on the Debtor's Schedules from Inspection of the Debtor's Property.</p> <p>Intended Purpose: To evaluate the assets and liabilities of the Debtor and to refresh witnesses' recollections.</p>			

Dated: April 2, 2025.

Respectfully submitted,

**HALL, ESTILL HARDWICK, GABLE,  
GOLDEN & NELSON, P.C.**

s/Steven W. Soulé

Steven W. Soulé, OBA No. 13781  
Christopher J. Gnaedig, OBA No. 33892  
Connor M. Andreen, OBA No. 35047  
521 East 2<sup>nd</sup> St., Suite 1200  
Tulsa, OK 74120  
Telephone: (918) 594-0400  
Facsimile: (918) 594-0505  
Email: [ssoule@hallestill.com](mailto:ssoule@hallestill.com)  
Email: [cгнаedig@hallestill.com](mailto:cгнаedig@hallestill.com)

-and-

Daniel V. Carsey, OBA No. 21490  
100 North Broadway, Suite 2900  
Oklahoma City, OK 73102  
Telephone: (405) 553-2828  
Facsimile: (405) 553-2855  
Email: [dcarsey@hallestill.com](mailto:dcarsey@hallestill.com)

**ATTORNEYS FOR GREAT PLAINS  
NATIONAL BANK**